

Office of the Secretary of Transportation

**GENERAL COUNSEL** 

1200 New Jersey Avenue, SE Washington, DC 20590

[49 CFR §§ 37.9, 37.41-37.43, 38.125]

June 16, 2015

## 1. Question:

What is the minimum width needed for a non-level boarding railroad passenger station platform to meet the accessibility requirements of the Americans with Disabilities Act (ADA)?

## Answer:

Under 49 CFR Part 37, all new or altered railroad station platforms, including non-level boarding platforms, used for intercity rail passenger service or commuter rail passenger service must be readily accessible to and usable by persons with disabilities, including persons who use mobility aids like wheelchairs or walkers. 49 CFR 37.9, 37.41-37.43, 37.55. We have received questions from entities constructing or altering platforms regarding the minimum platform width needed to accommodate passengers using such mobility aid devices. This Q&A may be used as guidance for the minimum width needed for non-level boarding platforms.

Where non-level boarding platforms exist, on-board lifts may be used to move passengers who cannot climb stairs from the platform level up to the passenger car. 49 CFR 37.165(g). The actual design of the platform lift mechanism varies from one builder to another, but it is not uncommon for the passenger car edge of the lift platform in the fully deployed position to be a number of inches away from the actual side of the passenger car body. An allowance of 1 foot from the side of the passenger car to the edge of the lift platform has been made to accommodate various lifting mechanism designs. The lifting platform cannot be more than 3 inches above the platform in the down position with a connecting ramp slope not exceeding 1:8 (49 CFR 38.95(b)(8), 38.125(b)(8)), which could result in a ramp to the lift platform being a maximum of 24 inches long. Per section 304.3 of the ADA Accessibility Guidelines (ADAAG), a space of at least 5 feet is required on the platform for a person using a wheelchair to turn and enter the on-board lift.

For a new or altered conventional non-level boarding side passenger platform with a railing or wall on the platform side opposite the track, the minimum platform width thus should be the sum of the maximum dimensions listed above -12 feet.

<sup>&</sup>lt;sup>1</sup> In addition, the maximum length of the lifting platform could be as much as 54 inches on new cars built to the Next Generation Corridor Equipment Pool Committee, i.e., the "Section 305 committee," specifications for certain intercity and high-speed railcars and 48 inches per the current regulations (49 CFR §§ 38.95(b)(6) and 38.125(b)(6)), which presumes end loading of the lift.

For a non-level boarding end loading island passenger platform (where passengers are entering or exiting the platforms of a stub-end station) located between two tracks, our calculation needs to account for the width of tactile strips. The additional width of the tactile strips (2 feet) required by 49 CFR 37.9(a) (applying ADAAG 705.2 and 810.5.2) for the next track should be added to the above dimension, which yields a total minimum width of 14 feet for an end loading island platform.

For a non-level boarding island passenger platform with vertical pedestrian access (by elevator, stairs, escalator, etc.), the minimum width should be the width of the vertical access feature (typically in the range of 8-12 feet) plus twice the 6 feet required by 49 CFR 37.42 for clearances around the sides of the stairwell, yielding 20-24 feet. The non-level boarding platform may be tapered to 14 feet at the end(s) of the platform.

## 2. Question:

What is the minimum width needed for a level boarding railroad passenger station platform to meet the accessibility requirements of the Americans with Disabilities Act (ADA)?

## **Answer**:

Under 49 CFR Part 37, all new or altered railroad station platforms, including non-level boarding platforms, used for intercity rail passenger service or commuter rail passenger service must be readily accessible to and usable by persons with disabilities, including persons who use mobility aids like wheelchairs or walkers. 49 CFR 37.9, 37.41-37.43, 37.55. We have received questions from entities constructing or altering platforms as to the minimum platform width needed to accommodate passengers using such mobility aid devices. This Q&A may be used as guidance for the minimum width needed for level boarding platforms.

A level boarding intercity or commuter railroad passenger station platform can have a gap between the passenger car door threshold and the edge of the platform that is at the maximum horizontal dimension of 10 inches on tangent track and 13 inches on curves and a maximum vertical dimension of 5.5 inches. 49 CFR 37.42(f). At level boarding platforms, where the gap exceeds plus or minus 5/8 inch vertical or 3 inches horizontal (49 CFR 37.42(f)), a bridge plate is typically used to allow a passenger using a wheelchair or other mobility device to move from the platform to the passenger car. While they can vary in dimensions, a typical bridge plate is approximately 3 feet long. Per ADAAG 304.3, a space of at least 5 feet is required on the platform for a passenger using a wheelchair to make a turn to enter the bridge plate and onto the passenger car.

For a conventional level boarding side passenger platform with a railing or a wall on the platform side opposite the track, the minimum platform width should be the sum of the maximum dimensions listed above - i.e., 8 feet.

For an end loading island passenger platform (where passengers are entering or exiting the platforms of a stub-end station) located between two tracks, our calculation needs to account for the width of tactile strips. The additional width of the tactile strips (2 feet) required by 49 CFR 37.9(a) (applying ADAAG 705.2 and 810.5.2) for the next track should be added to the above dimension, which yields a total minimum width of 10 feet for an end loading level boarding island platform.

For a level boarding island passenger platform with vertical pedestrian access (by elevator, stairs, escalators, etc.), the minimum width should be the width of the vertical access facility (typically in the range of 8-12 feet) plus twice the 6 feet required by 49 CFR 37.42(e)(1) for clearances around the sides of the stairwell, yielding 20-24 feet. The level boarding island with vertical pedestrian access platform may be tapered to 10 feet at the end(s) of the platform, as long as the gap between the car and the platform through the curved portion complies with 49 CFR 37.42(f), which defines the maximum allowable gap at level boarding platforms to be 10 inches on tangent and 13 inches on curved tracks.

Circumstances may arise where a 15-inch high passenger platform designed to provide level boarding to typical bi-level passenger cars is also used by conventional single level passenger cars, which typically have 51-inch car door heights. In this case, the 3 feet allocated for a bridge plate should be replaced by either the 5 feet used by an on-board lift or 4 feet used by a platform mounted lift. Thus, a 15-inch high platform used by single level passenger cars should be treated as if it were a non-level boarding platform.

**Table 1. Summary of Minimum Platform Width Guidance** 

Minimum Width	Conventional	<b>End Loading Island</b>	Island Platform with Vertical
	Platform	Platform	Access
Level Boarding	8 feet	10 feet	Width of vertical access feature plus
			6 feet on each side. May taper to a
			minimum of 10 feet at the ends so
			long as the platform gap is
			maintained.
Other than Level	12 feet	14 feet	Width of vertical access feature plus
Boarding			6 feet on each side. May taper to
			minimum of 14 feet at the ends.

Note: A 15-inch platform used with 51-inch equipment is treated as "other than level boarding."

The General Counsel of the Department of Transportation has reviewed this document and approved it as consistent with the language and intent of 49 CFR Parts 27, 37, and 38.